

MICHELLE GHAFAR (CA Bar No. 315842)
(Designated as counsel for service)
Earthjustice
180 Steuart Street, #194330
San Francisco, CA 94105
Tel: (415) 217-2186 / Fax: (415) 217-2040

ANDRIA H. SO (CA Bar No. 341595)
707 Wilshire Boulevard, Suite 4300
Los Angeles, CA 90017
Tel: (415) 217-2000 / Fax: (415) 217-2040

ELIZABETH B. FORSYTH (CA Bar No.
288311)
eforsyth@earthjustice.org
Earthjustice
810 Third Avenue, Suite 610
Seattle, WA 98104
Tel: (206) 531-0841 / Fax: (206) 343-1526

Counsel for Plaintiffs

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CENTER FOR BIOLOGICAL DIVERSITY,
et al.,

Plaintiffs,

v.

U.S. BUREAU OF LAND MANAGEMENT,
et al.,

Defendants.

No. 1:25-cv-00140-JLT-CDB

**STIPULATED MOTION FOR
ADMINISTRATIVE RELIEF TO
EXTEND MOTION TO DISMISS
BRIEFING DEADLINES AND
[PROPOSED] ORDER**

MOTION FOR ADMINISTRATIVE RELIEF

Defendants filed motions to dismiss in this case on April 25, 2025 (ECF Nos. 24, 25), and Federal Defendants filed a request for judicial notice the same day (ECF No. 24-3). Pursuant to Local Rule 233, the Parties hereby stipulate that Plaintiffs' response to the pending motions to dismiss and Federal Defendants' request for judicial notice shall be filed by May 23, 2025, and that Plaintiffs shall file a single combined response of no more than 50 pages. The Parties agree that Defendants' replies in support of their motions to dismiss shall be filed by June 6, 2025.

Respectfully submitted,

DATED: May 7, 2025 By: /s/ Elizabeth B. Forsyth
ELIZABETH B. FORSYTH

Counsel for Plaintiffs

DATED: May 7, 2025 By: /s/ Sean Marotta
SEAN MAROTTA

Counsel for Defendant Chevron U.S.A. Inc.

DATED: May 7, 2025 By: /s/ Tracy K. Hunckler
TRACY K. HUNCKLER

Counsel for Defendant Holmes Western Oil Corporation

DATED: May 7, 2025 ADAM R.F. GUSTAFSON
Acting Assistant Attorney General
U.S. Department of Justice
Environment and Natural Resources Division

By: /s/ Dustin J. Weisman
DUSTIN J. WEISMAN
Natural Resources Section
ALEX J. HARDEE
Environmental Defense Section

Counsel for Federal Defendants

[PROPOSED] ORDER

Pursuant to the Parties' stipulation, IT IS SO ORDERED. Plaintiffs' response to the pending motions to dismiss and Federal Defendants' request for judicial notice shall be filed by May 23, 2025. Plaintiffs shall file a single combined response of no more than 50 pages. Federal Defendants,' Chevron's, and Holmes Western's replies in support of their motions to dismiss shall be filed by June 6, 2025.

Dated:

Hon. Christopher D. Baker